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Kos Media and Markos Moulitsas Zúniga
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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 KOS MEDIA, LLC and
MARKOS MOULITSAS ZÚNIGA,

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14 PLAINTIFFS,

15 VS.

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17 RESEARCH 2000 AND DELAIR D. ALI,

18 DEFENDANTS.
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Case No.: C10-02894 MEJ

} [Assigned for all purposes to
Hon. Marie –Elena James, Courtroom B,
15th Floor]

} JOINT STATUS REPORT,
REQUEST AND STIPULATION
FOR PROPOSED CONTINUANCE
OF DATE for CASE
MANAGEMENT CONFERENCE

} Current Hearing Date: Dec. 02, 2010
Requested Hearing Date: Jan. 17, 2010

20 TO THE COURT, ALL THE PARTIES AND THEIR ATTORNEYS OF
21 RECORD:

22 By and through their undersigned counsel, Plaintiffs Kos Media and Markos
23 Moulitsas Zúniga (collectively “Plaintiffs”), and Defendants RESEARCH 2000 AND
24 DELAIR D. ALI (collectively “Defendants”) respectfully submit the following Status
25 Report, Request and Stipulation for Continuance of the hearing date in the above
26 captioned matter for the Case Management Conference currently set for Thursday
27 December 02, 2010.

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STATUS

The parties have reached an agreement as to the contours of a proper settlement but are still in the process of determining whether the execution of the proposed terms is feasible. The parties will know whether execution is feasible within one week. Accordingly, the parties hereby seek through their undersigned counsel a short continuance of the instant case management conference, currently on calendar for Thursday December 02, 2010.

In view of the foregoing, IT IS HEREBY STIPULATED and agreed by and between Plaintiffs and Defendants that the instant Case Management Conference shall be continued until January 17, 2011.

GOOD CAUSE

Good cause exists to grant the instant Request and allow the parties additional time to execute the contemplated settlement for the following reasons:

1. The parties have negotiated a settlement in good faith and it would be a waste of judicial resources for the Court to intervene at this stage when all that needs to be seen is whether the contemplated settlement is indeed feasible.

2. The contemplated settlement would likely result in a final and complete resolution of the instant controversy.

3. If the contemplated terms are not feasible, undersigned counsel may be able to reach an alternative arrangement without burdening the Court, and in any event, the most prudent present course is to wait and see whether the contemplated settlement will result in a final and complete resolution of the instant controversy.

4. The parties request a hearing date of January 17, 2011 in view of the fact that Plaintiffs' counsel will begin a five day jury trial in Los Angeles on January 03, 2010 and in contemplation of the pending holidays in December.

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1 **IT IS SO STIPULATED**

2 DATED: November 30, 2010

HOWREY

3
4 By: -/S/-
5 EMILY L. MAXWELL
6 Attorneys for Defendants Research 2000
and Delair D. Ali

7 DATED: November 30, 2010

COZEN O'CONNOR

8
9 By: -/S/-
10 NATHAN DOOLEY
11 ADAM C. BONIN
12 Attorneys for Plaintiffs Kos Media and
Markos Moulitsas Zuniga.

13 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

14 DATED: December __, 2010

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17 By: HON. MARIE – ELENA JAMES
18 Chief Magistrate Judge
19 United States District Court
Northern District of California

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